

12 January 2021

Jon Chow  
ASX Compliance Pty Limited  
Level 4, North Tower, Rialto  
525 Collins Street  
Melbourne VIC 3000

Dear Jon

**RESPONSE TO ASX PRICE QUERY**

Cirralto Limited ('Company') refers to your letter dated 12 January 2021.

Using the numbering in your letter, we respond to your questions as follows:

1. No. The Company is not aware of any information concerning it that has not been announced to the market which, if known by some in the market, could explain the recent trading in the Company's securities.

The Company notes its recent ASX announcements regarding agreements entered in to with Nasdaq listed Fiserv and VISA (announced Monday 7 December) and Fiserv and Mastercard (announced Monday 14 December) in quick succession has resulted in a significant increase in investor commentary across social media platforms, as well as increased trading activity in the Company's shares.

The Company continues to work closely with its partners in progressing programs of work in the payments sector and rolling out solutions to its customer networks and will update the market accordingly.

2. N/A.
3. The Company does not have any other explanation of the recent trading in its securities.
4. The Company confirms that it is in compliance with Listing Rule 3.1. and that there is no information that should be given to ASX about its financial condition in accordance with that rule.
5. The Company confirms that the responses to the questions above have been authorised by its Board of Directors.

Cirralto Limited  
ACN: 099 084 143  
Ph: 1300 682 108  
Suite 103, Level 1, 2 Queen Street,  
Melbourne VIC 3000

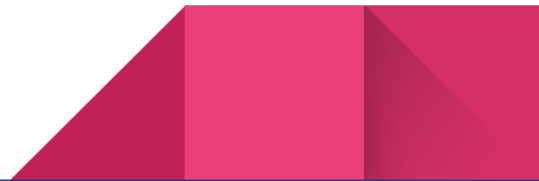
For personal use only



Yours sincerely

Justyn Stedwell  
Company Secretary  
On behalf of the Board of Directors  
Cirralto Limited

For personal use only





11 January 2021

Mr Justyn Stedwell  
Company Secretary  
Cirralto Limited  
Suite 103, Level 1, 2 Queen Street  
Melbourne VIC 3000

By email: justyn@stedwell.com.au

Dear Mr Stedwell

**Cirralto Limited ('CRO'): Price - Query**

ASX refers to the following:

- A. The change in the price of CRO's securities from a low of \$0.040 on 6 January 2021 to a high of \$0.053 today.
- B. The significant increase in the volume of CRO's securities traded today.

**Request for information**

In light of this, ASX asks CRO to respond separately to each of the following questions and requests for information:

- 1. Is CRO aware of any information concerning it that has not been announced to the market which, if known by some in the market, could explain the recent trading in its securities?
- 2. If the answer to question 1 is "yes".
  - (a) Is CRO relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in CRO's securities would suggest to ASX that such information may have ceased to be confidential and therefore CRO may no longer be able to rely on Listing Rule 3.1A. Accordingly, if the answer to this question is "yes", you need to contact us immediately to discuss the situation.
  - (b) Can an announcement be made immediately? Please note, if the answer to this question is "no", you need to contact us immediately to discuss requesting a trading halt (see below).
  - (c) If an announcement cannot be made immediately, why not and when is it expected that an announcement will be made?
- 3. If the answer to question 1 is "no", is there any other explanation that CRO may have for the recent trading in its securities?
- 4. Please confirm that CRO is complying with the Listing Rules and, in particular, Listing Rule 3.1.
- 5. Please confirm that CRO's responses to the questions above have been authorised and approved under its published continuous disclosure policy or otherwise by its board or an officer of CRO with delegated authority from the board to respond to ASX on disclosure matters.

**When and where to send your response**

This request is made under Listing Rule 18.7. Your response is required as soon as reasonably possible and, in any event, by no later than **9.30 AM AEDT Tuesday, 12 January 2021**. You should note that if the information requested by this letter is information required to be given to ASX under Listing Rule 3.1 and it does not fall within the exceptions mentioned in Listing Rule 3.1A, CRO's obligation is to disclose the information

For personal use only

---

'immediately'. This may require the information to be disclosed before the deadline set out in the previous paragraph and may require CRO to request a trading halt immediately.

Your response should be sent to me by e-mail at [ListingsComplianceMelbourne@asx.com.au](mailto:ListingsComplianceMelbourne@asx.com.au). It should not be sent directly to the ASX Market Announcements Office. This is to allow me to review your response to confirm that it is in a form appropriate for release to the market, before it is published on the ASX Market Announcements Platform.

### **Trading halt**

If you are unable to respond to this letter by the time specified above, or if the answer to question 1 is "yes" and an announcement cannot be made immediately, you should discuss with us whether it is appropriate to request a trading halt in CRO's securities under Listing Rule 17.1. If you wish a trading halt, you must tell us:

- the reasons for the trading halt;
- how long you want the trading halt to last;
- the event you expect to happen that will end the trading halt;
- that you are not aware of any reason why the trading halt should not be granted; and
- any other information necessary to inform the market about the trading halt, or that we ask for.

We require the request for a trading halt to be in writing. The trading halt cannot extend past the commencement of normal trading on the second day after the day on which it is granted. You can find further information about trading halts in Guidance Note 16 *Trading Halts & Voluntary Suspensions*.

### **Suspension**

If you are unable to respond to this letter by the time specified above, ASX will likely suspend trading in CRO's securities under Listing Rule 17.3.

### **Listing Rules 3.1 and 3.1A**

In responding to this letter, you should have regard to CRO's obligations under Listing Rules 3.1 and 3.1A and also to Guidance Note 8 *Continuous Disclosure*: Listing Rules 3.1 – 3.1B. It should be noted that CRO's obligation to disclose information under Listing Rule 3.1 is not confined to, nor is it necessarily satisfied by, answering the questions set out in this letter.

### **Release of correspondence between ASX and entity**

We reserve the right to release a copy of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

### **Questions**

If you have any questions in relation to the above, please do not hesitate to contact me.

Kind regards

---

**Jon Chow**

Adviser, Listings Compliance (Melbourne)